



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, New York 10007*

March 21, 2025

BY ECF

The Honorable Jeannette A. Vargas
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *State of New York et al. v. Trump et al.*, No. 25 Civ. 1144 (JAV)

Dear Judge Vargas:

This Office represents the defendants in the above-captioned matter. I am writing, with the consent of the plaintiffs, respectfully to request that the date for the defendants to submit their report to the Court regarding the remaining Treasury DOGE Team members be extended from Monday, March 24, 2025, to a date to be set by the Court after it rules on the defendants pending motion to partially dissolve the preliminary injunction as to Ryan Wunderly (ECF No. 111). As the Court is aware, in its February 21, 2025 Opinion and Order, the Court ordered the defendants to submit a report by March 24, 2025, addressing five specified issues pertaining to the Treasury DOGE Team members, with briefing to follow the submission of the report. *See* ECF No. 76 at 63-64. On March 5, 2025, the defendants filed a report with respect to Treasury DOGE Team member Ryan Wunderly (ECF No. 98), and, on March 10, 2025, moved to partially dissolve the preliminary injunction as to Mr. Wunderly (ECF No. 111). The defendants request this extension because they submit that it would be most efficient for the parties and the Court to first receive the Court's ruling on the defendants' motion to partially dissolve the preliminary injunction before the defendants submit an additional report and the parties submit further briefing. This is the defendants' first request for an extension of the deadline to submit the report.

The defendants also respectfully request a prompt ruling on their pending motion to partially dissolve the preliminary injunction as to Ryan Wunderly.

Thank you for your attention to this matter.

Respectfully,

MATTHEW PODOLSKY
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Southern District of New York
Attorney for Defendants

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